

EPA REGISTRATION NUMBER 19713-694



Drexel Chemical Company

August 12, 2019

Document Processing Desk (WD)
OPP (7504P), U.S. EPA
Rm S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

***Re: Request to Withdraw Drexel's Notification Submission Dated July 12, 2019 in Response to EPA's Letter dated August 7, 2019 Concerning Labeling Requirements for Products Containing Glyphosate
DREXEL MES-O-SATE HERBICIDE (EPA Reg. No. 19713-694)***

Sir/Madam:

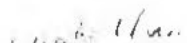
Drexel submitted by Notification on July 12, 2019 adding the product stewardship advisement statement regarding the International Agency for Research on Cancer (IARC)'s classification of glyphosate (amongst other label updates).

In view of the 08/07/2019 letter from the Agency concerning the labeling requirements for products containing glyphosate, Drexel request withdrawal of the said July 12, 2019 revised label notification submission.

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail lelan@drexchem.com.

Thank you.

Respectfully yours,
DREXEL CHEMICAL COMPANY


Luz G Chan
Registration Manager



Drexel Chemical Company

July 9, 2019

Document Processing Desk (NOTIF)
OPP (7504P), U.S. EPA
Rm S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re: Submission of Updated Label
DREXEL MES-O-SATE HERBICIDE (EPA Reg. No. 19713-694)

Sir/Madam:

Herewith, please find:

1. Completed EPA Form 8570-1
2. Two copies of the revised label. One copy is with following changes marked up:

On page 1:

- Updated the Herbicide Resistance Classification box. The three active ingredients were placed in three separate boxes.
- Added the product stewardship advisement statement regarding International Agency for Research on Cancer (IARC)'s classification of glyphosate.
- Added the optional "First Aid" and "Directions for Use" referral statements.

On page 14:

- Restated the pack sizes in the container handling section.

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail lchan@drexchem.com.

Thank you.

Respectfully yours,
DREXEL CHEMICAL COMPANY

Luz G Chan
Registration Manager



United States

Environmental Protection Agency

Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-694	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL MES-O-SATE HERBICIDE	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of updated label. Details are in the cover letter accompanying this submission.

This notification is consistent with the provisions of PR Notice 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container less than 5 gals; 5 gals & greater		5. Location of Label Directions <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Luz G Chan		Title Registration Manager		Telephone No. (Include Area Code) (901) 774-4370	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Registration Manager			
4. Typed Name Luz G Chan		5. Date 07/09/2019			

PROCESSING REQUEST

Reg # 19713-694

Decision # 535117 v 547441

Description: NEW ALT 1 v 2 CSFs

Electronic Label & Letter
(see PPLS):

OR

**Non Electronic
Label & Letter**
(Scanning required):

☐ Dated:

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: 10/5/17 (ALT 1) v 10/30/2018 (ALT 2)

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Sarah Meadows

Division: RD

Phone: 347-0505

Date: 3/28/19.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 11, 2019

Luz G. Chan
Registration Manager
Drexel Chemical Company
PO Box 13327
Memphis, TN 38113-0327

Subject: CSF Amendment – New Alternate CSFs 1 and 2
Product Name: DREXEL MES-O-SATE HERBICIDE
EPA Registration Number: 19713-694
Application Dates: 10/5/2017 and 10/30/18
Decision Numbers: 535117 and 547441

Dear Ms. Chan:

The Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 11/29/2016
- Alternate CSF 1 dated 10/5/2017
- Alternate CSF 2 dated 10/30/2018

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact Sarah Meadows by phone at 703-347-0505, or via email at meadows.sarah@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Emily Schmid".

Emily Schmid, Acting Product Manager 25
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs



Drexel Chemical Company

October 5, 2017

Document Processing Desk (AMEND)

Ms. Kathryn V. Montague, PM 23

OPP (7504P), U.S. EPA

Rm S-4900, One Potomac Yard

2777 South Crystal Drive

Arlington, VA 22202

Re: Submission of Alternate CSF

DREXEL MES-O-SATE HERBICIDE (EPA Reg. No. 19713-694)

Dear Ms. Montague,

Reference is made to the above. Enclosed, please find:

1. Completed EPA Form 8570-1
2. Copy of the Basic CSF dated 11/29/2016 currently accepted by EPA
3. Two copies of the proposed Alternate CSF dated October 5, 2017, supporting SDS and copy of the print out from the EPA Inert Finder showing the status of the inert ingredient as approved for food use.

The changes are highlighted for reference.

4. Formulator's Exemption statement

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
DREXEL CHEMICAL COMPANY

Luz G Chan

Registration Manager



United States
Environmental Protection Agency
Washington, DC 20460

☐
☒
☐

Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-694	2. EPA Product Manager Kathryn V Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL MES-O-SATE HERBICIDE	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327, Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of alternate CSF.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container less than 5 gals; 5 gals. and greater		5. Location of Label Directions <input checked="" type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Luz G Chan	Title Registration Manager	Telephone No. (include Area Code) (901) 774-4370
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Registration Manager	
4. Typed Name Luz G Chan	5. Date 10/05/2017	



Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

EPA File Symbol/Registration Number

19713-694

Product Name

DREXEL MESOSATE HERBICIDE

Date of Confidential Statement of Formula (EPA Form 8570-4)

10/05/2017

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Metolachlor + Glyphosate + Mesotrione

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Glyphosate	[REDACTED]	[REDACTED]
Mesotrione	[REDACTED]	[REDACTED]

Product ingredient source information may be entitled to confidential treatment

Signature

Luz G Chan

Name and Title

Luz G Chan, Registration Manager

Date

10/05/2017



Drexel Chemical Company

October 30, 2018

Document Processing Desk (AMEND)

Ms. Kathryn V. Montague, PM 23

OPP (7504P), U.S. EPA

Rm S-4900, One Potomac Yard

2777 South Crystal Drive

Arlington, VA 22202

Re: Submission of Alternate CSF #2

DREXEL MES-O-SATE HERBICIDE (EPA Reg. No. 19713-694)

Dear Ms. Montague,

Reference is made to the above. Enclosed, please find:

1. Completed EPA Form 8570-1
2. Copy of the Basic CSF dated 11/29/2016 currently accepted by EPA.
3. Two copies of the proposed Alternate CSF#2 dated October 30, 2018.
4. Formulator's Exemption statement

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,

DREXEL CHEMICAL COMPANY

Luz G Chan

Registration Manager



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-694	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL MES-O-SATE HERBICIDE	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327, Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of alternate CSF#2.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify)	
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container less than 5 gals; 5 gals. and greater		5. Location of Label Directions <input checked="" type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Luz G Chan	Title Registration Manager	Telephone No. (include Area Code) (901) 774-4370
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registration Manager	
4. Typed Name Luz G Chan	5. Date 10/30/2018	



Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

EPA File Symbol/Registration Number

19713-694

Product Name

DREXEL MESOSATE HERBICIDE

Date of Confidential Statement of Formula (EPA Form 8570-4)

10/30/2018

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Metolachlor + Glyphosate + Mesotrione

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Glyphosate	[REDACTED]	[REDACTED]
Mesotrione	[REDACTED]	[REDACTED]

Product ingredient source information may be entitled to confidential treatment

Signature

Luz G Chan

Name and Title

Luz G Chan, Registration Manager

Date

10/30/2018



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL
SAFETY AND POLLUTION
PREVENTION

October 12, 2018

I, Reuben Baris, Herbicide Branch, Registration Division, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Ecuador) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issues registration numbers for the product(s) listed below to:

DREXEL CHEMICAL COMPANY
P. O. BOX 13327
MEMPHIS, TN 38113-0327

EPA Registration Number:

19713-694

Name of Product:

DREXEL MES-O-SATE HERBICIDE

Reuben Baris
Risk Manager 25
Herbicide Branch
Registration Division 7505P





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL
SAFETY AND POLLUTION
PREVENTION

October 12, 2018

I, Reuben Baris, Herbicide Branch, Registration Division, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., El Salvador) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issues registration numbers for the product(s) listed below to:

DREXEL CHEMICAL COMPANY
P. O. BOX 13327
MEMPHIS, TN 38113-0327

EPA Registration Number:

19713-694

Name of Product:

DREXEL MES-O-SATE HERBICIDE

Reuben Baris
Risk Manager 25
Herbicide Branch
Registration Division 7505P





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL
SAFETY AND POLLUTION
PREVENTION

October 12, 2018

I, Reuben Baris, Herbicide Branch, Registration Division, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Guatemala) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issues registration numbers for the product(s) listed below to:

DREXEL CHEMICAL COMPANY
P. O. BOX 13327
MEMPHIS, TN 38113-0327

EPA Registration Number:
Name of Product:

19713-694
DREXEL MES-O-SATE HERBICIDE

Reuben Baris
Risk Manager 25
Herbicide Branch
Registration Division 7505P





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL
SAFETY AND POLLUTION
PREVENTION

October 12, 2018

I, Reuben Baris, Herbicide Branch, Registration Division, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Honduras) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issues registration numbers for the product(s) listed below to:

DREXEL CHEMICAL COMPANY
P. O. BOX 13327
MEMPHIS, TN 38113-0327

EPA Registration Number:

19713-694

Name of Product:

DREXEL MES-O-SATE HERBICIDE

Reuben Baris
Risk Manager 25
Herbicide Branch
Registration Division 7505P





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL
SAFETY AND POLLUTION
PREVENTION

October 12, 2018

I, Reuben Baris, Herbicide Branch, Registration Division, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Nicaragua) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issues registration numbers for the product(s) listed below to:

DREXEL CHEMICAL COMPANY
P. O. BOX 13327
MEMPHIS, TN 38113-0327

EPA Registration Number:

19713-694

Name of Product:

DREXEL MES-O-SATE HERBICIDE

Reuben Baris
Risk Manager 25
Herbicide Branch
Registration Division 7505P



S: 1025371

Milestone Email:

Reuben Baris

Regulatory Type: Product Registration - Section 3

Application Type: Miscellaneous Receipt

Company: 19713 DREXEL CHEMICAL COMPANY

Fee For Service: ☒ Yes ☐ No

Billable: ☒ Yes ☐ No

V

Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 25

Product #: 19713-694

Product Name: DREXEL MES-O-SATE HERBICIDE

Me Too Section3: 100-1282

Me Too Product Name: HALEX GT HERBICIDE

Application Date: 19-Sep-2018

OPP Recvd Date: 21-Sep-2018

Front End Date: 28-Sep-2018

Risk Manager Send Date: 28-Sep-2018

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Receipt Description: ☐ ☐ ☐ ☐ ☐ ☐

Gold Seal Certificates for Guatemala, Nicaragua, Ecuador, Honduras and El Salvador. One Fed Ex return label was supplied for Gold Seal requests involving 9 products

Receipt Content	Des
Other	Gold Seal

View/Edit

10/12/18



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 28, 2018

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-544659
EPA File Symbol or Registration Number: 19713-694
Product Name: DREXEL MES-O-SATE HERBICIDE
EPA Receipt Date: 21-Sep-2018
EPA Company Number: 19713
Company Name: DREXEL CHEMICAL COMPANY

WANDA KOONCE-DAVIS
DREXEL CHEMICAL COMPANY
PO Box 13327
MEMPHIS, TN 38113-0327

SUBJECT: Receipt of Request for Gold Seal Certification Letter(s)

Dear Registrant:

The Office of Pesticide Programs has received your request for Gold Seal Certification letter(s) that is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The action has been identified as action code M006:

UP TO 5 GOLD SEAL CERTIFICATION LETTERS PER REGISTRATION

No additional payment is due at this time. If you have any questions, please contact Betty Williams at (703) 308-0132.

Sincerely,

A handwritten signature in black ink, appearing to be "JH".

Front End Processing Staff
Information Technology & Resources Management Division



Drexel Chemical Company

September 19, 2018

Document Processing Desk (CERT)
U.S. Environmental Protection Agency
One Potomac Yard Room S-4900
2777 S. Crystal Drive
Arlington VA 22202

RE: Requests for Gold Seal Letters for Drexel Chemical Company (EPA Company No. 19713)

Please find enclosed completed forms 8570-1 and a copy of the required payments (Drexel Chemical Company e-receipt) attached to the front of each application for the products as shown on each form 8570-1.

I have also included a FedEx AWB if you would like to return via courier once all requests have been completed.

Please let me know if you have any questions or need additional information. I can be reached at 901-774-4370, ext. 334.

Kind regards,
DREXEL CHEMICAL COMPANY

Wanda Koonce-Davis
International Registrations
wdavis@drexchem.com





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-694	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL MES-O-SATE	PM# 25 (RB)	
5. Name and Address of Applicant (include ZIP Code) DREXEL CHEMICAL COMPANY P.O. BOX 13327 MEMPHIS, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.) Request for GOLD SEAL letters for export:

QUANTITY	COUNTRY	QUANTITY	COUNTRY	QUANTITY	COUNTRY
1	Guatemala	1	Nicaragua	1	Ecuador
1	Honduras	1	El Salvador		

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Scott A. Pace email: space@drexchem.com		Title Director, Registrations	
Telephone No. (Include Area Code)			
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			8. Date Application Received (Stamped)
2. Signature 		3. Title Director, Registrations	
4. Typed Name Scott A. Pace email: space@drexchem.com		5. Date 09/12/18	



Receipt

Your payment is complete

Pay.gov Tracking ID: 26CA38QL

Agency Tracking ID: 75575217516

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$2,493.00

Transaction Date: 09/17/2018 05:35:58 PM EDT

Payment Date: 09/17/2018

Registration Number: 39,238,301,520,674-694

Company Name: Drexel Chemical Company

Company Number: 19713

Action Code: M006

Account Information

Cardholder Name: Robert Shockey

Card Type: Visa

Card Number: *****5166

Email Confirmation Receipt

Confirmation Receipts have been emailed to:
wdavis@drexchem.com

PROCESSING REQUEST

Reg # 19713-694 Decision # 523711

Description: NEW PRODUCT

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

☒ Dated: 4/6/17

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: 11/29/16

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: SARAH MEADOWS

Division: PD

Phone: 347-0505.

Date: 5/25/17



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs

Registration Division (7505P)

1200 Pennsylvania Ave., N.W.

Washington, D.C. 20460

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

EPA Reg. Number:

19713-694

Date of Issuance:

4/6/17

Term of Issuance:

Conditional

Name of Pesticide Product:

DREXEL MES-O-SATE
HERBICIDE

Name and Address of Registrant (include ZIP Code):

Drexel Chemical Company
PO Box 13327
Memphis, TN 38113-0327

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Reuben Baris, Product Manager 25
Herbicide Branch, Registration Division (7505P)

Date:

4/6/17

2. You are required to comply with the data requirements described in the DCI Order identified below:
 - a. Metolachlor GDCI-108801-1506
 - b. Mesotrione GDCI-122990-1474

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI Order listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division:

<http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>

3. The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. A one year study is required to satisfy these data requirements. You have 18 months from the date of registration to provide these data.
4. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 19713-694."
5. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 11/29/2016

If you have any questions, please contact Sarah Meadows by phone at 703-347-0505, or via email at meadows.sarah@epa.gov.

Enclosure

Drexel

Mes-O-Sate

For post-emergence weed control in glyphosate tolerant Corn.

ACTIVE INGREDIENT:

Metolachlor.....	20.50%
Glyphosate, N-(phosphonomethyl) glycine	20.50%
Mesotrione.....	2.05%
OTHER INGREDIENTS:	56.95%
TOTAL:	100.00%

*This product contains 2.09 pounds of metolachlor, 2.09 pounds of glyphosate and 0.209 pound of mesotrione per gallon.

KEEP OUT OF REACH OF CHILDREN
CAUTION

See FIRST AID Below

SHAKE WELL BEFORE USING
[RECIRCULATE CONTENTS BEFORE USE]

ACCEPTED**04/06/2017**

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. **19713-694**

EPA Reg. No. 19713-XXX

EPA Est. No. 19713-XX-XXX

Net Content: Gals. (L)

FIRST AID**IF INHALED:**

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have a person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.
You may also call CHEMTREC at 800-424-9300 for emergency medical treatment information.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if inhaled. Causes moderate eye irritation. Avoid breathing spray mist. Avoid contact with eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some people.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: Coveralls over short-sleeved shirt and short pants, chemical-resistant gloves, chemical-resistant footwear plus socks, chemical-resistant headgear for overhead exposure and chemical-resistant apron when cleaning equipment, mixing or loading

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS

Mixers and loaders supporting aerial applications are required to use closed systems. The closed system must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)]. When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands thoroughly before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

For terrestrial uses, do not apply directly to water or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash water or rinsate.

Ground Water Advisory

The active ingredient, metolachlor, has the potential to leach through soil into ground water under certain conditions as a result of agricultural use. Ground water may be contaminated if this product is used in areas where soils are permeable, particularly where the water table is shallow.

Surface Water Advisory

The active ingredients in this product have the potential to contaminate surface water through ground spray drift. Under some conditions, the active ingredients may also have a potential for runoff into surface water (primarily via dissolution in runoff water) for several months post-application. These include poorly drained or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow ground water, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas overlaying tile drainage systems that drain to surface water.

A level, well maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential for contamination of water from runoff. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours. Sound erosion control practices will reduce this product's contribution to surface water contamination.

Mixing and Loading Instructions

Take care when using this product to prevent back siphoning into wells, spills, or improper disposal of excess pesticide, spray mixtures or rinsates.

Check valves or anti-siphoning devices must be used on mixing equipment.

This product may not be mixed/loaded or used within 50 feet of wells, including abandoned wells, drainage wells, and sink holes. Operations that involve mixing, loading, rinsing, or washing of this product into or from pesticide handling or application equipment or containers within 50 feet of any well are prohibited, unless conducted on an impervious pad constructed to withstand the weight of the heaviest load that may be positioned on or moved across the pad. Such a pad shall be designed and maintained to contain any product spills or equipment leaks, container or equipment rinse or wash water, and rain water that may fall on the pad. Surface water shall not be allowed to either flow over or from the pad, which means the pad must be self-contained. The pad shall be sloped to facilitate material removal. An unroofed pad shall be of sufficient capacity to contain at a minimum 110% of the capacity of the largest pesticide container or application equipment on the pad. A pad that is covered by a roof of sufficient size to completely exclude precipitation from contact with the pad shall have a minimum containment capacity of 100% of the capacity of the

Meadows, Sarah

From: Luz Chan <lchan@drexchem.com>
Sent: Friday, March 24, 2017 10:56 AM
To: Meadows, Sarah
Cc: Scott Pace
Subject: FW: 19713-AOU Drexel Mes-O-Sate Herbicide
Attachments: 19713-AOU label edits with RDB.PDF; 019713-000AOU.20170323 .pdf; 019713-000AOU.20170323 .pdf

RESUBMISSION

Sarah, good morning.

Here is our revised label. However, we are respectfully excluding comment #2 on page 3 of the label for the reason given below. Instead, on page 11, under the section "This Product – Sequential Weed Control", we added the following statement:

"This product may also be applied following pre-emergence application of products containing mesotrione (e.g., Callisto, Mesotryone™ 4L) not to exceed 0.24 pound of mesotrione a.i. per acre per year."

Mes-O-Sate contains 0.209 pound of mesotrione and at the highest labeled rate of 4.0 pints per acre, the amount of mesotrione applied will only be 0.1 pound mesotrione per acre. Mesotrione a.i. is allowed to be applied at the maximum rate of 0.24 pound per acre per year. This means that a follow up application of product containing mesotrione can still be made as long as the maximum 0.24 pound mesotrione a.i. per acre per year is not exceeded.

To Reuben's comments # 3, 4, & 5 on page 4 of the label, we respectfully would want to leave the statement as is under the section "Use Precautions". They are more of an advisory statement.

The rest of the comments were addressed.

Hope the attached revised label is acceptable.

Thank you,
Luz G Chan
(901) 774-4370

From: Meadows, Sarah [mailto:Meadows.Sarah@epa.gov]
Sent: Thursday, March 23, 2017 2:36 PM
To: Luz Chan <lchan@drexchem.com>
Subject: RE: 19713-AOU Drexel Mes-O-Sate Herbicide

Hi Luz. I have attached a copy of this proposed label with our comments. Please make these changes and send me a clean copy.

Thanks,

Sarah

From: Luz Chan [mailto:lchan@drexchem.com]
Sent: Tuesday, February 07, 2017 3:49 PM
To: Meadows, Sarah <Meadows.Sarah@epa.gov>
Subject: RE: 19713-AOU Drexel Mes-O-Sate Herbicide

Sarah, good afternoon.

Here is the pdf label. I have replaced the Pesticide Disposal statements per the request of our Marketing people. Hope it's ok with you.

Thank you,

Luz

From: Meadows, Sarah [mailto:Meadows.Sarah@epa.gov]
Sent: Tuesday, February 07, 2017 2:35 PM
To: Luz Chan <lchan@drexchem.com>
Subject: 19713-AOU Drexel Mes-O-Sate Herbicide

Hi Luz. Can you please send me a PDF of this proposed label?

Thanks!

Sarah

NOTICE: This email, together with any attachments, may contain confidential, privileged, or non-public information. If you are not the intended recipient of this email, please delete without copying, and notify the sender of the error. Do not forward this email without permission from the sender. This email is not a contract, and cannot be used to show the existence of a valid contract between Drexel Chemical Company, the sender, or any recipient. Use, dissemination, distribution, or reproduction of this message by unintended recipients is not authorized and may be unlawful.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION

DP BARCODE No: D 437979; EPA Reg. No. /FILE SYMBOL No.: 19713-AOU; FOOD Use: Yes
DECISION No.: 523711; PC Code(s): 122990, 417300, 108801; ACTION CODE: R301
PRODUCT NAME: Drexel Mes-O-Sate Herbicide

DATE: February 23, 2017

SUBJECT: End Use Product Chemistry Review
Product Name: Drexel Mes-O-Sate Herbicide

FROM: Akiva Abramovitch, Ph.D.
CITAB / RD (7505P)

THROUGH: Shyam Mathur, Ph.D.
Product Chemistry Team Leader
CITAB / RD (7505P)

TO: Sarah Meadows / Reuben Baris, PM Reviewer / RM 25;
Herbicide Branch / RD (7505P)

Company Name: Drexel
MRID No(s): 501129-01 and -02

INTRODUCTION:

The registrant has submitted an application for the registration of the end use herbicide product. In support of the application, the registrant has submitted 830 series group A & B product chemistry data in MRID 501229-01 and -02 and a basic CSF November 29, 2016. The CITAB has been asked to determine acceptability of the data submitted and whether this product is substantially similar to the cited product.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient(s): Metolachlor (20.50%), Glyphosate (20.50%) and Mesotrione (2.05%)
2. Has the registrant claimed substantial similarity to a registered product?

[X] Yes; [] No; [] NA; if yes give the registration number of the cited product.
EPA Reg. No. 100-1282

3. All of the source materials of the active ingredient are derived from registered sources- [X] Yes [] No
4. All inert ingredients have been screened by CITAB (Inert Team) and found to be approved for the proposed label uses - [X] Yes; [] No.
5. Confidential Statement of Formula(s):

[X] Basic - Dated: November 29, 2016
[] Alternate CSF

Re-submitted - Dated:
Re-submitted - Dated:

Alternate CSF(s) complies with 40CFR§152.43: [] Yes; [] No; [X] NA

DP BARCODE No: D 437979; EPA Reg. No. /FILE SYMBOL No.: 19713-AOU; FOOD Use: Yes
DECISION No.: 523711; PC Code(s): 122990, 417300, 108801; ACTION CODE: R301
PRODUCT NAME: Drexel Mes-O-Sate Herbicide

6. Product label

- a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with product label (PR Notice 91-2).

☒ Yes ☐ No; if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)

☒ Yes; ☐ No; if not, explain below

Metallic equivalent: ☐ Yes ☒ NA;

Soluble arsenic: ☐ Yes ☒ NA

Isomeric ratios: ☐ Yes ☒ NA

Acid Equivalent: ☐ Yes ☒ NA; acid equivalent = Dichlorophenoxyacetic acid 0.458%

- b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes; ☒ No; ☐ NA

Methanol at > 4%: ☐ Yes; ☒ No; ☐ NA

Sodium nitrate/sodium nitrite ☐ Yes; ☒ No; ☐ NA

- c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☐ Yes ☒ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes; ☐ No; ☒ NA; if not, explain below

- d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No; if yes explain below:

DP BARCODE No.: D 437979; EPA Reg. No./FILE SYMBOL No.: 19713-AOU; FOOD Use: Yes
 DECISION No.: 523711; PC Code(s): 122990, 417300, 108801; ACTION CODE: R301
 PRODUCT NAME: Drexel Mes-O-Sate Herbicide

7. Group A: Product Chemistry Data

CITAB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title	Data submitted		CITAB's Assessment of Data	MRID Nos.
		Yes	No		
830.1550	Product Identity & Composition	Y		A	501129-01
830.1600	Description of materials used to produce the product	Y		A	501129-01
830.1650	Description of formulation process	Y		A	501129-01
830.1670	Discussion on the formation of impurities	Y		A	501129-01
830.1700	Preliminary analysis	NA		NA	501129-01
830.1750	Certified limits (158.350)	Standard certified limits	Y	A	501129-01
		Proposed Limits			
		Justification for wider limits			
830.1800	Enforcement analytical method ¹	Y		A-Validated HPLC method for specificity, accuracy and linearity	501129-01

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

1. If validation of analytical method is not provided, the data requirements should be "N" (Not Acceptable)

DP BARCODE No.: D 437979; EPA Reg. No. /FILE SYMBOL No.: 19713-AOU; FOOD Use: Yes
 DECISION No.: 523711; PC Code(s): 122990, 417300, 108801; ACTION CODE: R301
 PRODUCT NAME: Drexel Mes-O-Sate Herbicide
 8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos.
830.6303	Physical State	Off-white to white color with a mild odor	A	501129-02
830.6314	Oxidation/Reduction	Product is expected to be compatible when mixed with water, ammonium phosphate, Fe powder, hydrocarbon solvent and with 5% potassium permanganate.	W	
830.6315	Flammability	Not flammable- Flash point above 200F	A	501129-02
830.6316	Explosibility	Product does not contain explosive properties.	W	
830.6317	Storage stability	Not submitted	G	
830.6320	Corrosion Characteristics	Not submitted	G	
830.7000	pH	4.3 at 21 C	A	501129-02
830.7100	Viscosity	400 cP	A	501129-02
830.7300	Density (units)	10.19 lb/gal	A	501129-02

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request, NA = Not applicable, I = In progress, U = Upgradeable.

DP BARCODE No: D 437979; EPA Reg. No. /FILE SYMBOL No.: 19713-AOU; FOOD Use: Yes
DECISION No.: 523711; PC Code(s): 122990, 417300, 108801; ACTION CODE: R301
PRODUCT NAME: Drexel Mes-O-Sate Herbicide

CONCLUSIONS:

CITAB has reviewed the product chemistry data submitted/cited for the end-use product and has concluded that:

A. Substantial similarity to the cited product (Reg. No. 100-1282) from Product chemistry view point

- ☒ Similar
☐ Not similar, give reasons:
☐ Identical
☐ Not identical
☐ Not applicable

B. Confidential Statement of formula

- ☒ Basic CSF (dated November 29, 2016)
☐ Acceptable
☐ Not Acceptable
☐ Not Applicable

Alternate CSF

- ☐ Acceptable -
☐ Not Acceptable -
☒ Not Applicable

If not acceptable give reasons

C. Group A Product Chemistry Data

- ☒ Acceptable
☐ Not acceptable
☐ Acceptable with the exception of Guideline(s):
☐ Not required
☐ Data cited

D. Group B Product chemistry data

- ☐ Acceptable
☐ Not acceptable
☒ Acceptable with the exception of Guideline(s): (830.6317 & 830.6320) not submitted
☐ Not required
☐ Data cited

E. Product Label/Draft Label

Recommendations – Yes ☐; No ☒



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

21/DEC/2016

SIMILARITY MEMORANDUM

Subject: Name of Pesticide Product: Drexel Mes-O-Sate
EPA Reg. No. /File Symbol: 19713-AOU
DP Barcode: D437133
Decision No: 523711
Action Code: R301
PC Codes: 108801 (metolachlor), 417300 (glyphosate)
122990 (mesotrione)

From: Eugenia McAndrew, Biologist *Eugenia McAndrew*

Through: John C. Redden, Senior Risk Assessor
Chemistry, Inerts and Toxicology Assessment Branch *JCR*
Registration Division (7505P)

To: Sarah Meadow, RM Team 25
Herbicide Branch
Registration Division (7505P)

Applicant: Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Metolachlor	20.50
Glyphosate	20.50
Mesotrione	2.05
<u>Other Ingredients:</u>	<u>56.95</u>
Total:	100.00%

ACTION REQUESTED: Similarity determination for 19713-AOU, proposed product, and 100-1282, cited product.

BACKGROUND: Drexel Chemical Company has applied for registration of Drexel Mes-O-Sate, EPA File Symbol 19713-AOU, claiming to be substantially similar to Halex GT Herbicide, EPA Reg. No. 100-1282. The submission includes a basic CSF dated November 29, 2016, label, data matrix and company letter.

The registrant is using the selective method of data support to satisfy the acute toxicity data requirements. The data matrix submitted cites five acute toxicity studies with MRIDs 470731-03 to -07. The registrant is requesting waiver from the requirement for a skin sensitization study and will accept a positive classification. A search of the OPP databases shows that these studies were submitted to support the registration of the cited product. They were reviewed and classified as acceptable in a 2007 Technical Review Branch memo (Odiott; D338417; EPA File Symbol 100-REIE; 31/JULY/2007).

RECOMMENDATIONS:

1. We compared the basic CSFs and labels of the proposed product, 19713-AOU, and the cited product, 100-1282, and determined that the two products are substantially similar.
2. The cited acute toxicity data are acceptable to support this registration.
3. The acute toxicity profile for the proposed product, Drexel Mes-O-Sate, EPA File Symbol 19713-AOU, is as follows:

acute oral toxicity	IV	cited	MRID 47073103
acute dermal toxicity	IV	cited	MRID 47073104
acute inhalation toxicity	III	cited	MRID 47073105
primary eye irritation	III	cited	MRID 47073106
primary skin irritation	IV	cited	MRID 47073107
dermal sensitization	positive	waived	self-validated

4. The proposed basic CSF submitted for 19713-AOU must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #: 019713-00694

PRODUCT NAME: Drexel Mes-O-Sate

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if inhaled. Causes moderate eye irritation. Avoid breathing spray mist. Avoid contact with eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wear: long-sleeved shirt and long pants, socks, shoes and waterproof gloves.

First Aid:

If inhaled:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

User Safety Recommendations:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change clothing.

Napoli, Alexandra

From: Luz Chan <lchan@drexchem.com>
Sent: Tuesday, November 29, 2016 11:22 AM
To: Napoli, Alexandra
Subject: FW: Submission Deficiency (EPA Reg. No. 19713-AOU)
Attachments: Inert Clearance Status Form_.docx; 16-11-29 Inert Finder.pdf

Dear Ms. Napoli,

Thank you for your below e-mail. Our response is as follows:

- The EPA Inert Finder website that checks whether an inert is listed and cleared for food and nonfood uses indicates that the inert in question based on their CAS Nos. are listed and are cleared for food and non-food uses. Please see attached.
- As for OPPTS Guideline 830.1700 Preliminary Analysis, the product being submitted is an end-use product and the said guideline requirement does not apply to this product as the product is not produced by an integrated system.

Please let me know whether the above helped.

Thank you,

Luz G Chan

(901) 774-4370

From: Napoli, Alexandra [mailto:Napoli.Alexandra@epa.gov]
Sent: Tuesday, November 29, 2016 9:56 AM
To: Luz Chan <lchan@drexchem.com>
Cc: Ashe, Anthony <Ashe.Anthony@epa.gov>
Subject: Submission Deficiency (EPA Reg. No. 19713-AOU)

Dear Ms. Chan,

My name is Alexandra Napoli and I am a contractor with the EPA. I am contacting you in regards to your submission in support of the product Drexel Mes-O-Sate Herbicide (EPA Reg. No. 19713-AOU). We have found a few deficiencies with the submission that will need to be addressed:

1. Please see the attached Inert Clearance Status Form.
2. The Data Matrices you provided are missing the following guidelines. Please provide updated data matrices providing information about its status:
 - a. 830.1700: Preliminary Analysis.

Please send the necessary documents in pdf file form before December 08th so that we may further process your submission. After December 08th, please direct all correspondence/corrections to the appropriate EPA Risk Manager. If you have any questions, please do not hesitate to contact me.

Best,

Napoli, Alexandra

From: Luz Chan <lchan@drexchem.com>
Sent: Tuesday, November 29, 2016 11:53 AM
To: Napoli, Alexandra
Cc: Ashe, Anthony
Subject: FW: Submission Deficiency (EPA Reg. No. 19713-AOU)
Attachments: Inert Clearance Status Form_.docx; 16-11-29 Basic CSF .pdf

Importance: High

Sorry. Forgot to check the Basic Formulation box.

Here it is.

Luz

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: Luz Chan
Sent: Tuesday, November 29, 2016 10:50 AM
To: 'Napoli.Alexandra@epa.gov' <Napoli.Alexandra@epa.gov>
Cc: Ashe, Anthony <Ashe.Anthony@epa.gov>
Subject: FW: Submission Deficiency (EPA Reg. No. 19713-AOU)
Importance: High

Dear Ms. Napoli,

Follow up to our telephone conversation this morning regarding the above, please find the revised CSF restating the #4 component to match what is in the Manufacturing Process study.

If there's anything further, just kindly let me know.

Thank you for your help.

Luz G Chan

(901) 774-4370

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From: Napoli, Alexandra [<mailto:Napoli.Alexandra@epa.gov>]
Sent: Tuesday, November 29, 2016 9:56 AM
To: Luz Chan <lchan@drexchem.com>
Cc: Ashe, Anthony <Ashe.Anthony@epa.gov>
Subject: Submission Deficiency (EPA Reg. No. 19713-AOU)

Dear Ms. Chan,

My name is Alexandra Napoli and I am a contractor with the EPA. I am contacting you in regards to your submission in support of the product Drexel Mes-O-Sate Herbicide (EPA Reg. No. 19713-AOU). We have found a few deficiencies with the submission that will need to be addressed:

1. Please see the attached Inert Clearance Status Form.
2. The Data Matrices you provided are missing the following guidelines. Please provide updated data matrices providing information about its status:
 - a. 830.1700: Preliminary Analysis.

Please send the necessary documents in pdf file form before December 08th so that we may further process your submission. After December 08th, please direct all correspondence/corrections to the appropriate EPA Risk Manager. If you have any questions, please do not hesitate to contact me.

Best,

Alexandra Napoli

EPA Contractor- Inoventures, LLC
2777 S. Crystal Drive, S-4815
Arlington, VA 22202
(703) 347-8784
napoli.alexandra@epa.gov

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

[illegible]




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date 11/17/2016			EPA Reg No./File Symbol 19713-XXX		Page 1 of 3
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL MES-O-SATE HERBICIDE		
Ingredient Metolachlor + Glyphosate + Mesotrione					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product identity and composition	TBD	Drexel Chemical Company	Own	
830.1600	Description of materials used to produce the product	TBD	Drexel Chemical Company	Own	
830.1650	Description of formulation Process	TBD	Drexel Chemical Company	Own	
830.1670	Discussion of formation of impurities	TBD	Drexel Chemical Company	Own	
830.1750	Certified Limits	-	Drexel Chemical Company	Own	See CSF
830.1800	Enforcement analytical method	TBD	Drexel Chemical Company	Own	
830.1900	Submittal of samples	-	-	-	1
830.6302	Color	TBD	Drexel Chemical Company	Own	
830.6303	Physical state	TBD	Drexel Chemical Company	Own	
830.6304	Odor	TBD	Drexel Chemical Company	Own	
830.6314	Oxidation/Reduction	-	-	-	2
830.6315	Flammability	TBD	Drexel Chemical Company	Own	
830.6316	Explosibility	-	-	-	3
830.6317	Storage stability	-	-	-	4
830.6319	Miscibility	-	-	-	5
Signature 			Name and Title SCOTT PACE, DIRECTOR OF REGISTRATION		Date 11/17/2016



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date 11/17/2016

EPA Reg No./File Symbol 19713-XXX

Page 2 of 3

Applicant's/Registrant's Name & Address

DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327

Product

DREXEL MES-O-SATE HERBICIDE

Ingredient Metolachlor + Glyphosate + Mesotrione

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6320	Corrosion characteristics	-	-	-	4
830.6321	Dielectric breakdown voltage	-	-	-	6
830.7000	pH	TBD	Drexel Chemical Company	Own	
830.7100	Viscosity	TBD	Drexel Chemical Company	Own	
830.7300	Density	TBD	Drexel Chemical Company	Own	
830.6313	Stability to normal and elevated temperature, metal....	-	-	-	7
870.1100	Acute oral toxicity	47073103	Syngenta Crop Protection	Pay	
870.1200	Acute dermal toxicity	47073104	Syngenta Crop Protection	Pay	
870.1300	Acute inhalation toxicity	47073105	Syngenta Crop Protection	Pay	
870.2400	Acute eye irritation	47073106	Syngenta Crop Protection	Pay	
870.2500	Acute dermal irritation	47073107	Syngenta Crop Protection	Pay	
870.2600	Skin sensitization	-	-	-	8

Signature

Name and Title

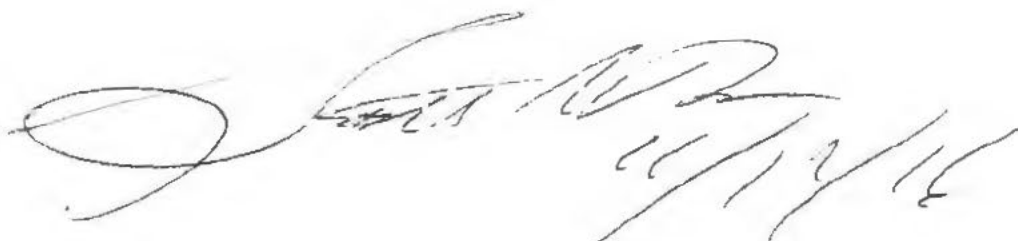
SCOTT FACE, DIRECTOR OF REGISTRATION

Date

11/17/2016

DATA MATRIX NOTES - DREXEL MES-O-SATE HERBICIDE (EPA File Symbol 19713-XXX)

- 1 **Submittal of Samples:** Not required at this time.
- 2 **Oxidation/Reduction Reaction:** Not applicable. Product does not contain an oxidizing or reducing agent.
- 3 **Explodability:** Not applicable. Product is not potentially explosive.
- 4 **Storage Stability and Corrosion Characteristics:** Study is underway. Results of the test will be submitted to the Agency once study is completed.
- 5 **Miscibility:** Not applicable. Product is not intended for dilution with petroleum solvents.
- 6 **Dielectric breakdown voltage:** Not applicable. Product is not intended for use around electrical equipment.
- 7 **Stability to normal and elevated temperatures, metal and metal ions:** Accelerated storage stability at $54 \pm 2^{\circ}\text{C}$ is underway. Results of the test will be submitted to the Agency once the study is completed. Product is not expected to be in contact with metal and metal ions, thus, this is not applicable.
- 8 **Skin Sensitization:** Drexel requests waiving of the Skin Sensitization (OPPTS 870.2600) guideline requirement. Statement under the section "PRECAUTIONARY STATEMENTS" on the label that reads, "This product may cause skin sensitization reactions in some individuals.", is already included.

A handwritten signature in black ink, followed by the date "11/12/14". The signature is stylized and appears to be "J. [unclear]".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Drexel Chemical Company, P.O. Box 13327, Memphis, TN 38113-0327 (Tel 901 774-4370)	EPA Registration Number/File Symbol 19713-XXX
Active Ingredient(s) and/or representative test compound(s) METOLACHLOR + GLYPHOSATE + MESOTRIONE	Date 11/17/2016
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial food crops	Product Name DREXEL MES-O-SATE HERBICIDE

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

Submission of me-too registration

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

Typed or Printed Name and Title

11/17/2016

SCOTT PACE, Director of Registration Division



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Form Approved

OMB No. 2070-0060. Approval Expires 5-31-98.

Applicant's Name and Address

Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

EPA File Symbol/Registration Number

19713-XXX

Product Name

DREXEL MESOSATE HERBICIDE

Date of Confidential Statement of Formula (EPA Form 8570-4)

11/17/2016

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Metolachlor + Glyphosate + Mesotrione

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Glyphosate	[REDACTED]	[REDACTED]
Mesotrione	[REDACTED]	[REDACTED]

Product ingredient source information may be entitled to confidential treatment

Signature

Luz G. Chan

Name and Title

Luz G Chan, Registration Manager

Date

November 17, 2016

Drexel Chemical Company

November 17, 2016

Document Processing Desk (REGFEE)
ATTN: Ms. Kathryn V Montague, PM 23
 Office of Pesticide Programs (7505P)
 U.S. Environmental Protection Agency
 Rm S-4900, One Potomac Yard
 2777 S Crystal Drive, Arlington, VA 22202

Re: Submission of Me-Too Registration Application
DREXEL MES-O-SATE HERBICIDE (EPA File Symbol 19713-XXX)

Dear Ms. Montague,

Reference is made to the above. Please find:

1. PRIA fee amounting to \$1897.00 for Code Action R301
2. Completed EPA Form 8570-1
3. Two copies of the proposed Basic CSF
4. Formulator's Exemption Statement for two active ingredients in the product
5. Certification with respect to citation of data
6. Data Matrix for Metolachlor Technical and a copy of Drexel's 90-day response to the Metolachlor Generic DCI received on February 25, 2016
7. Data Matrix that addresses Drexel Mes-O-Sate Herbicide's Product Specific data requirements
8. Three (3) copies of the following studies:

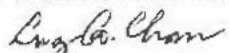
50112901 • *Manufacturing Process for Drexel Mesosate (DRXL 201631)*
 (OPPTS 830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800)

50112902 • *Physical and Chemical Characteristics of Drexel Mesosate: Color, Physical State, Odor, pH, Flammability, Viscosity and Density (DRXL 201632)*
 (OPPTS 830.6302, 830.6303, 830.6304, 830.6315, 830.7000, 830.7100, 830.7300)

9. Five (5) copies of the proposed label.

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370, or e-mail lchan@drexchem.com. Thank you.

Respectfully yours,
 FOR DREXEL CHEMICAL COMPANY


 Luz G Chan
 Registration Manager

1700 Channel Avenue • Post Office Box 13327 • Memphis, Tennessee 38113-0327
 Phone: (901) 774-4370 • Fax: (901) 774-4666 • E-Mail: info@drexchem.com • www.DrexChem.com

SINCE 1972



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-XXX	2. EPA Product Manager Kathryn V Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL MES-O-SATE HERBICIDE	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 100-1282 Product Name Halax GT	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of me-too-registration under PRIA Code R301.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container less than 5 gals; 5 gals and greater		5. Location of Label Directions <input checked="" type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Luz G Chan	Title Registration Manager	Telephone No. (Include Area Code) (901) 774-4370	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Registration Manager	
4. Typed Name Luz G Chan		5. Date 11/17/2016	



Receipt

Your payment is complete

Pay.gov Tracking ID: 25V2B4Q9

Agency Tracking ID: 75130889455

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$1,897.00

Transaction Date: 11/17/2016 02:42:12 PM EST

Payment Date: 11/17/2016

Registration Number:

Company Name: DREXEL CHEMICAL COMPANY

Company Number: 19713

Action Code: R301

Account Information

Cardholder Name: ROBERT D SHOCKEY

Card Type: Visa

Card Number: *****1355

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

Lchan@drexchem.com



Drexel Chemical Company

May 18, 2016

Document Processing Desk (DCI-PRD)
Attn: Mr. Steven Snyderman
Office of Pesticide Programs (7508P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

***Re: 90-Day Response to the Metolachlor Generic DCI (ID # GDCI-108801-1506)
Received February 25, 2016***

Dear Mr. Snyderman,

Herewith, please find:

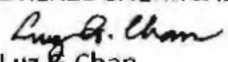
1. Completed Data Call-In Response form
2. Completed Requirements Status and Registrant's Response Form

The agreement to share in cost to develop the data between the members of the Metolachlor Task Force (MTF) and Syngenta will be submitted to the Agency under a separate cover once finalized.

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

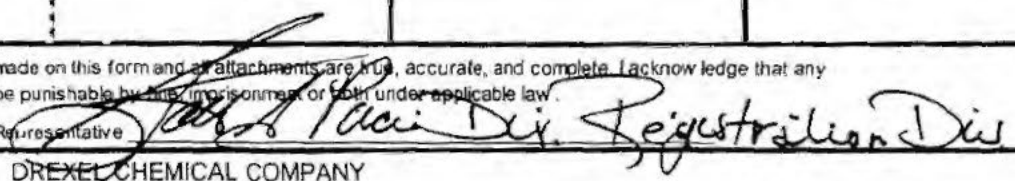
Respectfully yours,
DREXEL CHEMICAL COMPANY


Luz B Chan
Registration Manager

United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-4

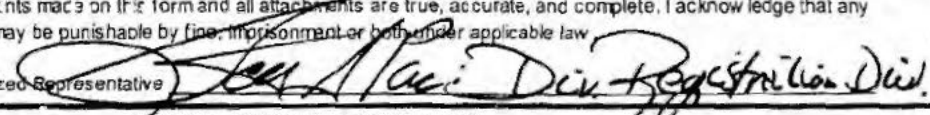
INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address DREXEL CHEMICAL COMPANY P.O. Box 13327 MEMPHIS, TN 381130327		2. Case # and Name 0001 - Metolachlor Chemical # and Name: 108801 Metolachlor		3. Date and Type of DCI and Number 25-Feb-2016 GENERIC ID # GDCL-108801-1506	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
19713-539			X	N/A	N/A
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment, or both under applicable law.				9. Date May 18, 2016	
Signature and Title of Company's Authorized Representative  David A. Pacini, Dir. Registration Div					
10. Name of Company DREXEL CHEMICAL COMPANY				11. Phone Number (901) 774-4370	

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-3


INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address DREXEL CHEMICAL COMPANY P.O. Box 13327 MEMPHIS, TN 381130327		2. Case # and Name 0001 - Metolachlor Chemical # and Name: 108801 Metolachlor			3. Date and Type of DCI and Number 25-Feb-2016 GENERIC ID # GDCH-108801-1506				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	Environmental Fate Data Requirements (Conventional Chemical)								
835.4100	Aerobic soil metabolism (2, 19)	N				K,C,A	TGA1	24	2
835.4200	Anaerobic soil metabolism (3, 19)	N				K,C,A	TGA1	24	2
835.4300	Aerobic aquatic metabolism (10, 19)	N				K,C,A	TGA1	24	2
835.4400	Anaerobic aquatic metabolism (10, 19)	N				K,C,A	TGA1	24	2
	Nontarget Plant Protection Data Requirements (Conventional Chemical)								
850.4100	Seedling Emergence and Seedling Growth (20)	N				K,C,A	DEGR	12	2
	Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)								
850.2100	Avian acute oral toxicity test (6, 8, 19)	N				K,C,A	TGA1	12	2
850.3040	Field testing for pollinators	Y				K,C,A	TEP	24	2
10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.							11. Date May 18, 2016		
Signature and Title of Company's Authorized Representative  John A. Maci, Dir. Registration Div.									
12. Name of Company DREXEL CHEMICAL COMPANY							13. Phone Number (901) 774-4370		

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-3

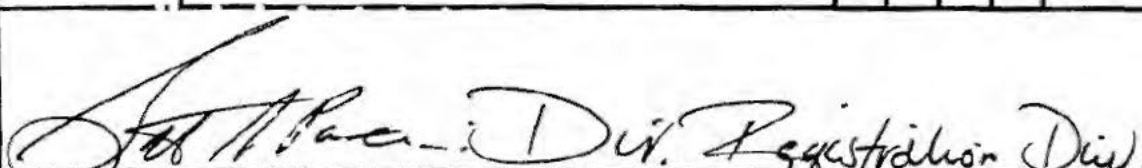
INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address DREXEL CHEMICAL COMPANY P.O. Box 13327 MEMPHIS, TN 381130327		2. Case # and Name 0001 - Metolachlor Chemical # and Name: 108801 Metolachlor			3. Date and Type of DCI and Number 25-Feb-2016 GENERIC ID # GDCI-108801-1506				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical) (1, 5, 9, 19, 22)								
	Toxicology Data Requirements (Conventional Chemical)								
870.3465	90-day Inhalation toxicity (7)	N				K.C.A	TGAI	24	2
850.6100	Environmental Chemistry Methods and Associated Independent Laboratory Validation (18, 19)	N				K.C.A	TGAI	12	2
SS-1155	Residues in Pollen and Nectar/Field Residue Analysis (14, 19, 21)	Y				K.C.A	TEP	24	2
SS-1254	Adult honeybee chronic oral toxicity (11, 19, 22)	Y				K.C.A	TGAI	12	2
SS-1315	Semi-field testing for pollinators (4, 16, 17, 19, 22)	Y				K.C.A	TEP	24	2
							May 18, 2016		

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address DREXEL CHEMICAL COMPANY P.O. Box 13327 MEMPHIS, TN 381130327		2. Case # and Name 0001 - Metolachlor Chemical # and Name: 108801 Metolachlor			3. Date and Type of DCI and Number 25-Feb-2016 GENERIC ID # GDCI-108801-1506				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
SS-1323	Pollinator Acute Oral Toxicity honeybee larvae (13, 15, 19, 22)	Y				K,C,A	TGA I	12	2
SS-1324	Pollinator Chronic Oral Toxicity honeybee larvae (12, 15, 19, 22)	Y				K,C,A	TGA I	12	2
							May 18, 2016		

INERT CLEARANCE STATUS FORM

Reviewer Name: Alexandra Napoli			Request Date: November 29 th , 2016
Tel: 703-347-8784	ISB	CUBE: S-4815	MAIL CODE:

A. COMMENTS:

The Submitter submitted a revised CSF (on 11/29/2016) listing [REDACTED]
[REDACTED] (see email correspondence).

B. PESTICIDE PRODUCT INFORMATION:

Receipt Number: 995122	Date on CSF: Nov. 17 th , 2016	Food-Use Pesticide: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EPA Reg. No/File Symbol: 19713-AOU	Formulation:	
Product Name: Drexel Mes-O-Sate Herbicide		

C. INGREDIENT INFORMATION:

Ingredient No.1	Tolerance Exemption(s) ¹					
	910	920	930	940	950	960
Chem. Name: [REDACTED]						
Trade Name: Glucopon 425						
CAS Reg. No.: 110615-47-9 & 68515-73-1						

Comments: [REDACTED] is not listed in the Agency database. Please provide a manufacture letter (with letterhead) providing full compositional information including the manufacturer, constituent names, CAS numbers, and weight/weight percentage composition (100% composition). [REDACTED] is listed in the Agency database, if this is the intended inert, please submit a new CSF with this correction.

Reviewer Name: Alexandra Napoli

Review Date: 11/29/2016

¹Language from the Code of Federal Regulations (40 CFR 180, subpart D):

40 CFR 180.910: Inert ingredients used pre- and post-harvest; 40 CFR 180.920: Inert ingredients used pre-harvest; 40 CFR 180.930: Inert ingredients applied to animals; 40 CFR 180.940: Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations; 40 CFR 180.950: Tolerance exemptions for minimal risk active and inert ingredients; and 40 CFR 180.960: Polymers.